

EXHIBIT 3 TO
DECLARATION OF SHANEE Y. WILLIAMS
ISO ADVANCEME'S OPPOSITION TO DEFENDANT'S
MOTION TO EXTEND DISCOVERY DEADLINE

From: Deborah Race [mailto:drace@icklaw.com]

Sent: Friday, June 22, 2007 3:09 PM

To: Edelman, Michael N.

Cc: Lemieux, Ronald (Ron) S.

Subject: FW: Motion for Extension of Discovery Deadlines as to Depositions--AdvanceMe v. AmeriMerchant

Here is Joey's response.

Deborah Race

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7/9/2007

drace@icklaw.com

From: Gray, Joseph [mailto:jgray@velaw.com]

Sent: Friday, June 22, 2007 4:36 PM

To: Matt Rowan; Deborah Race

Cc: Doug McSwane

Subject: RE: Motion for Extension of Discovery Deadlines as to Depositions--AdvanceMe v. AmeriMerchant

Deborah, Matt, and Doug:

The motion looks fine to me. I would propose (as Doug mentioned he discussed with Deborah) that the parties exchange lists of parties they currently intend to depose in the AmeriMerchant case so that everyone has a rough idea of what the schedule will look like in August and early September. I understand that several of the Paul Hastings folks have vacations planned in August, and we will do our best to accommodate their schedules (as several of us also have vacations planned). We do not expect that there are more than a couple of depositions per side. I will follow this email with an email to the group listing the depositions we currently intend to take in the AmeriMerchant action.

Regards,
Joey

From: Matt Rowan [mailto:a43@potterminton.com]

Sent: Friday, June 22, 2007 4:18 PM

To: drace@icklaw.com; Gray, Joseph

Cc: Doug McSwane

Subject: Motion for Extension of Discovery Deadlines as to Depositions--AdvanceMe v. AmeriMerchant

Deborah and Joey:

Pursuant to Doug's previous e-mail of this afternoon, I am forwarding to you both a **draft** of the Joint Motion to Extend Deadlines for Conducting of Depositions. Please review and make any suggestions. I have attached the Draft Motion and the Draft Proposed Order. Both are in Word format.

Please let me know of any changes I can make.

Matt

J. Matt Rowan

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